

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHUN-KO CHANG, individually and on behalf of all  
others similarly situated,

Plaintiff,

-against-

Case No.: 7:24-cv-08980-PMH

SHEN YUN PERFORMING ARTS, INC., FEI TIAN  
COLLEGE, FEI TIAN ACADEMY OF THE ARTS,  
DRAGON SPRINGS BUDDHIST INC.,  
INTERNATIONAL BANK OF CHICAGO, SHUJIA  
GONG a/k/a TIANLIANG ZHANG, HONGZHI LI, and  
RUI LI,

**NOTICE OF MOTION TO  
WITHDRAW AS COUNSEL BY  
JOSHUA J. GRAUER**

Defendants.

-----X

**PLEASE TAKE NOTICE** that, pursuant to Local Civil Rule 1.4, and upon the Declaration of Joshua J. Grauer, the undersigned attorney of record for Defendants Shen Yun Performing Arts, Inc., Fei Tian College, Fei Tian Academy of Arts, and Dragon Springs Buddhist Inc. (collectively, the “Defendants”) will move this Court before the Honorable Philip M. Halpern, at the United States Courthouse, Southern District of New York, 300 Quarropas Street, White Plains, New York, 10601, for an Order granting Joshua J. Grauer’s Motion to Withdraw as counsel for Defendants.

Dated: White Plains, New York  
February 6, 2025

Respectfully submitted,

**CUDDY & FEDER LLP**  
*Attorneys for Defendants*  
445 Hamilton Avenue - 14<sup>th</sup> Floor  
White Plains, New York 10601  
Tel. (914) 761-1300

By: /s/ Joshua J. Grauer  
Joshua J. Grauer (JG4594)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
CHUN-KO CHANG, individually and on behalf of all  
others similarly situated,

Plaintiff,

Case No.: 7:24-cv-08980-PMH

-against-

SHEN YUN PERFORMING ARTS, INC., FEI TIAN  
COLLEGE, FEI TIAN ACADEMY OF THE ARTS,  
DRAGON SPRINGS BUDDHIST INC.,  
INTERNATIONAL BANK OF CHICAGO, SHUJIA  
GONG a/k/a TIANLIANG ZHANG, HONGZHI LI, and  
RUI LI,

Defendants.

-----X

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on the 6th day of February, 2025, the foregoing document has been filed electronically, is available for viewing and downloading from the ECF System, and is being served upon all counsel of record via ECF transmission in accordance with the Electronic Filing System of the Court.

I FURTHER CERTIFY that on February 6, 2025, a copy of the foregoing document has been served via first-class mail on Defendants Shen Yun Performing Arts, Inc., Fei Tian College, Fei Tian Academy of Arts, and Dragon Springs Buddhist Inc. to the following addresses:

Dragon Springs Buddhist Inc.  
140 Galley Hill Road  
Cuddebackville, NY 12729

Shen Yun Performing Arts, Inc.  
140 Galley Hill Road  
Cuddebackville, NY 12729

Fei Tian College  
140 Galley Hill Road  
Cuddebackville, NY 12729

Fei Tian Academy of Arts  
140 Galley Hill Road  
Cuddebackville, NY 12729

/s/ Joshua J. Grauer  
Joshua J. Grauer